

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 06-136-GMS
	:	
MICHAEL T. JACKSON,	:	
	:	
Defendant.	:	

MOTION TO EXTEND THE TIME FOR THE FILING OF PRE-TRIAL MOTIONS

Defendant Michael T. Jackson, by and through his undersigned counsel, Christopher S. Koyste, hereby moves the Court to issue an order that extends the deadline for the filing of pre-trial motions 30 days from the due date of January 24, 2007 to February 23, 2007. Counsel submits the following in support thereof:

1. Mr. Jackson was indicted on November 28, 2006 for being a felon in possession of a firearm in violation of 18 U.S.C. Section 922(g)(1) and for possessing cocaine base in violation of 21 U.S.C. Section 844(a). Pre-trial motions are to be filed without leave of Court on January 24, 2007.

2. To date, the AUSA Robert F. Kravetz and Counsel have been in negotiation in relation to this case and are very close to reaching a plea agreement. However, on January 19, 2007 AUSA Kravetz was informed of an issue involving potential relevant conduct which could affect the ability of the parties to amicably resolve this case. Upon hearing of this issue AUSA Kravetz immediately requested documentation in relation to this issue and informed Defense Counsel.

3. The Defense asserts that additional time is needed by the parties to obtain information in

relation to this potential relevant conduct so that the parties are fully informed of the circumstances that could affect sentencing in this case. Since additional time will likely allow the parties to resolve this case, the Defense requests the Court to enlarge the time period for the filing of pretrial motions an additional 30 day time period, to February 23, 2007. Counsel informed Mr. Jackson of the above described facts on January 22, 2007 and he is in agreement with this request. Mr. Jackson asserts that such an enlargement of times is in the interests of justice and in the best interest of the Defense since it will allow the Defense to have all pertinent information from which to base its decisions.

4. AUSA Robert F. Kravetz does not oppose the Defense's request.

WHEREFORE, Mr. Michael T. Jackson respectfully requests the Court to issue an order that extends the time period for the filing of pre-trial motions from January 24, 2007 to February 23, 2007.

/s/
CHRISTOPHER S. KOYSTE, ESQUIRE
Assistant Federal Public Defender
704 King Street, Suite 110
Wilmington, Delaware 19801
Attorney for Michael T. Jackson

Dated: January 23, 2007

CERTIFICATE OF SERVICE

Undersigned counsel certifies that this Motion to Extend the Time for the Filing of Pre-Trial Motions is available for public viewing and downloading and was electronically delivered on January 23, 2007 to:

Robert F. Kravetz, Esq.
Assistant United States Attorney
1007 Orange Street, Suite 700
Wilmington, Delaware 19801

_____/s/_____
CHRISTOPHER S. KOYSTE, ESQUIRE
Assistant Federal Public Defender
704 King Street, Suite 110
Wilmington, Delaware 19801
Attorney for Michael T. Jackson

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ORDER

Having considered Defendant's Motion to Extend the Time for the Filing of Pre-Trial Motions,

IT IS HEREBY ORDERED this _____ day of January, 2007, that Defendant Michael Motion is **GRANTED** and the time period for the filing of pre-trial motions is extended to February 23, 2007

The Honorable Gregory M. Sleet
U.S. District Court

cc: AUSA Robert F. Kravetz
AFPD Christopher S. Koyste